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VIA ECF & E-MAIL

September 20, 2022

United States District Court
Southern District of New York
Attn: Gregory H. Woods, U.S.D.J.
500 Pearl Street, Courtroom 12C
New York, NY 10007-1312
woodsnyisdchambers@nysd.uscourts.gov

Re: Molina v. Hornblower Group, Inc., *et al.*
Case No.: 1:20-cv-10821 (GHW) (OTW)
Letter Motion for Adjournment of Teleconference re Defendants' Summary Judgment Motion

Dear Judge Woods:

This office represents the Plaintiff in the above-referenced case. Plaintiff writes with the consent of Defendants to respectfully request an adjournment of the teleconference currently scheduled for Friday, September 23, 2022 at 1:00 PM to discuss Defendants' pending motion for summary judgment. See ECF Docket Entry 47. For the reasons set forth below, Plaintiff respectfully submits that good cause exists to grant the requested adjournment to some date after October 11, 2022.¹

Pursuant to ¶ 1(E) of this Court's Individual Rules of Practice in Civil Cases (hereinafter the "Court's Rules"), Plaintiff submits that: (1) the current appearance date is set forth *supra*; (2) there have been no previous requests for an adjournment of this conference; (3) the reason for the request is because your undersigned will be traveling from September 19, 2022 through October 6, 2022, and is unable to participate in the teleconference as a result of same; (4) the adversaries consent; and (5) no proposed Revised Civil Case Management Plan and Scheduling Order is necessary.

Given the foregoing circumstances, Plaintiff respectfully submits that good cause exists to grant the requested adjournment. See Fed. R. Civ. P. 6(b)(1)(A). Accordingly, Plaintiff submits that the instant letter motion be granted.

Plaintiff thanks this honorable Court for its time and attention to this case.

¹ The Jewish holiday of Succos falls between October 9, 2022 through October 11, 2022, and your undersigned observes this holiday.

Dated: Forest Hills, New York
September 20, 2022

Respectfully submitted,

SHALOM LAW, PLLC

/s/ Jonathan Shalom

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